

*[Parties and Counsel Listed on Signature Pages]*

**UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

THIS FILING RELATES TO:

ALL ACTIONS

MDL No. 3047

Civil Case No. 4:22-md-03047-YGR (PHK)

Honorable Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

**STIPULATION REGARDING STATE  
30(B)(6) DEPOSITIONS**

**STIPULATION**

Defendants Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; and Meta Platforms Technologies, LLC (collectively, “Meta”) and the State Attorneys General (“State AGs”) respectfully submit this Stipulation regarding the dispute identified in Section IV(D) of the Parties’ March 14, 2025 DMC Statement as “Meta’s Amended Rule 30(b)(6) Notice to State Plaintiffs Asserting Consumer Protection and/or COPPA Claims” (the “**Dispute**”). ECF 1767 at 6.

WHEREAS, the Parties have repeatedly met and conferred by video conference, email, and correspondence regarding the Dispute, and continue to engage in these negotiations.

WHEREAS, the State AGs contended the Dispute was ripe for resolution at the March 20, 2025 DMC, while Meta disagreed.

WHEREAS, the Parties have reached agreements to facilitate efficient resolution of their remaining disagreements with respect to the Dispute.

THEREFORE, the Parties have agreed:

1. To resolve their disagreement as to the ripeness of the Dispute without court intervention or argument at the March 20, 2025, Discovery Management Conference.
2. To continue their conferrals on the Dispute on Friday, March 21, 2025, and during the following week, in attempts to resolve outstanding issues common to all State Plaintiffs asserting consumer protection and/or COPPA claims.
3. To continue coordinating their conferrals in connection with the State AGs’ Notice of 30(b)(6) Deposition to Meta promptly and in good faith. To be clear, the terms of this Stipulation in no other way impact ongoing negotiations or any other rights with respect to the State AGs’ Notice of 30(b)(6) Deposition to Meta.

1           4.       To file a joint-letter brief on the Dispute in accordance with this Court's applicable  
2 Standing Orders by Friday, March 28, 2025, raising any unresolved issues common to all State Plaintiffs  
3 asserting consumer protection and/or COPPA claims. Such joint-letter brief has now been filed (ECF  
4 1807).

5           5.       To forgo oral argument on the joint-letter brief filed on March 28, 2025 (ECF 1807), and  
6 rest their arguments on the filing as submitted to the Court.

7           6.       That no depositions of any witnesses designated to provide testimony in connection with  
8 Meta's amended Rule 30(b)(6) notices to State Plaintiffs asserting consumer protection and/or COPPA  
9 claims shall occur until at least fourteen (14) days have passed from the date upon which the Court  
10 enters an order on the Dispute as submitted to the Court on Friday, March 28, 2025. Meta reserves its  
11 right to seek a further extension of the July 18, 2025 deadline to complete fact discovery as to the  
12 Plaintiff States depending on the timing of the Parties' resolution of the Dispute and/or order of the  
13 Court on any joint-letter brief filed.

14           7.       Nothing in this Stipulation will automatically affect other deadlines in the case schedule,  
15 but this Stipulation may or may not require future requests by the Parties on other deadlines. The Parties  
16 reserve all rights with respect to other changes to deadlines.

17  
18  
19  
20 DATED: April 11, 2025

Respectfully submitted,  
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**ATTESTATION**

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: April 11, 2025

By: /s/ Ashley M. Simonsen